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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALDO MUDRANO AYALA,
ANGEL ANTHONY ESPARZA,
RONALD PAUL SEPULVEDA,
SAMUEL O. MORALES, AND
ALLEN DAVID FONG,

Defendants.

CASE NO. 2:23-CR-00271-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT
AND ORDER

STIPULATION

1. By previous order, this matter was set for status on March 7, 2025.
2. By this stipulation, the parties now move to continue the status conference until June 6, 2025, and to exclude time between March 7, 2025, and June 6, 2025, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Following his arrest based upon the superseding indictment, Defendant Alexis Rodriguez appeared in the Western District of Washington on January 16, 2025. The Court in the Western District of Washington ordered Defendant Alexis Rodriguez detained and transported to the Eastern District of California. Defendant Alexis Rodriguez is still in transit and has yet to appear in the Eastern District of California.

1 b) The government intends to produce discovery including cell phone extractions of
2 multiple devices, social media search warrant returns, investigative reports, financial records,
3 and other materials constituting voluminous data. This material will be produced pursuant to a
4 proposed Protective Order. Moreover, the nature of the charges contained within the
5 superseding indictment, volume of discovery, and number of defendants make the case unusual
6 and complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for
7 the trial itself within the time limits established by the Speedy Trial Act.

8 c) Counsel for defendants have yet to receive discovery and will require additional
9 time to review the discovery materials and charges, conduct investigation, conduct research
10 related to the charges, to assess the viability of any pretrial motions, and arrange for in-person
11 visits to discuss potential resolutions with their clients.

12 d) Counsel for defendants believe that failure to grant the above-requested
13 continuance would deny them the reasonable time necessary for effective preparation, taking into
14 account the exercise of due diligence.

15 e) The government also requires additional time to submit a proposed Protective
16 Order to govern the sharing and review of discovery, to produce the voluminous discovery, and
17 to coordinate the initial appearance of Defendant Alexis Rodriguez in the Eastern District of
18 California.

19 f) Based on the above-stated findings, the ends of justice served by continuing the
20 case as requested outweigh the interest of the public and the defendants in a trial within the
21 original date prescribed by the Speedy Trial Act.

22 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
23 *et seq.*, within which trial must commence, the time period of March 7, 2025 to June 6, 2025,
24 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(ii) and (iv) [Local
25 Codes T2 and T4] because it results from a continuance granted by the Court at the parties'
26 request on the basis of the Court's finding that the ends of justice served by taking such action
27 outweigh the best interest of the public and the defendant in a speedy trial.
28

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act warrant time periods excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 24, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ ROBERT C. ABENDROTH
ROBERT C. ABENDROTH
Assistant United States Attorney

Dated: February 25, 2025

By: /s/ Todd David Leras
TODD DAVID LERAS
Counsel for Ronaldo Mudrano Ayala

Dated: February 25, 2025

By: /s/ Christopher Richard Cosca
CHRISTOPHER RICHARD COSCA
Counsel for Angel Anthony Esparza

Dated: February 25, 2025

By: /s/ Megan Taylor Hopkins
MEGAN TAYLOR HOPKINS
Counsel for Ronald Paul Sepulveda

Dated: February 25, 2025

By: /s/ Mark Joseph Reichel
MARK JOSEPH REICHEL
Counsel for Samuel O. Morales

Dated: February 25, 2025

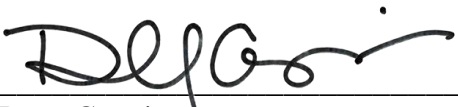
By: /s/ David Delmer Fischer
DAVID DELMER FISCHER
Counsel for Allen David Fong

ORDER

The parties stipulated request to continue and exclude time is ADOPTED. Accordingly, the Status Conference set for March 7, 2025 is VACATED and RESET for June 6, 2025 at 9:30 AM in Courtroom 8 before the Honorable Dena M. Coggins. Time is excluded between March 7, 2025, and June 6, 2025, under Local Codes T2 and T4.

IT IS SO ORDERED.

Dated: March 3, 2025


Dena Coggins
United States District Judge